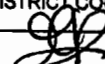


**FILED**

OCT 05 2020

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY  DEP CLK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:20-CR-377-1M

UNITED STATES OF AMERICA

v.

JESSE JAMES FREEMAN

UNOPPOSED MOTION FOR  
MODIFICATION OF DEFENDANT'S  
RELEASE CONDITIONS

**(UNDER SEAL)**

The Defendant, Jesse James Freeman, by and through counsel, respectfully requests that his conditions of release be modified based on the following:

1. On September 30, 2020, Mr. Freeman appeared before United States District Judge Myers for his initial appearance and arraignment, and pled guilty to Count One of the sealed criminal information which charged him with violating the Lacey Act, in violation of 16 U.S.C. §§ 3372(a)(2)(A) and 3373(d)(1)(B).
2. At the conclusion of his arraignment, Mr. Freeman was released on conditions.
3. Among other standard conditions of release, Mr. Freeman is prohibited from possessing a firearm "or other destructive device."
4. Mr. Freeman is a bow hunter<sup>1</sup>, and hunts to provide his family with food for their use throughout the year. The hunting season runs from September 12 through January 2.

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<sup>1</sup> Mr. Freeman advises counsel he hunts with a Barnett Kryptonite Crossbow on private property located directly behind his home.

5. Upon meeting his supervising United States Probation Officer Nathan Bradley to review the conditions of release, Mr. Bradley advised Mr. Freeman he would need the conditions of release modified to specifically allow him to possess his bow.
6. United States Probation Officer Nathan Bradley, Mr. Freeman's supervising officer, has advised counsel that he does not oppose the requested modification.
7. Assistant United States Attorney Banu Rangarajan, who represents the government in this matter has been contacted and does not oppose the requested modification.

WHEREFORE and for the foregoing reasons, the Defendant respectfully requests that this Honorable Court modify the previously imposed release conditions to allow him to possess a bow for the purposes of hunting.

Respectfully requested this 5th day of October, 2020.

G. ALAN DuBOIS  
Federal Public Defender

*for*  AFPD Joseph H. Craven  
DIANA H. PEREIRA  
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N.C. State Bar No. 32615  
LR 57.1 Counsel  
Appointed

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

BANUMATHI RANGARAJAN  
Assistant United States Attorney  
150 Fayetteville Street, Suite 2100  
Raleigh, NC 27601

and

NATHAN BRADLEY  
United States Probation Officer  
Salisbury, North Carolina

by e-mail.

This the 5<sup>th</sup> day of October, 2020.



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N.C. State Bar No. 32615  
LR 57.1 Counsel  
Appointed